

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Kristin Lawson, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

Full Tilt Poker Ltd., et al.

Defendants.

Case No. 11-cv-06087

[Returnable Thursday, February 23,  
2012 at 2:15 pm in Courtroom 15-A]

**NOTICE OF PLAINTIFF KRISTEN LAWSON'S  
MOTION FOR LEAVE TO AMEND COMPLAINT**

PLEASE TAKE NOTICE that attorneys for plaintiff Kristin Lawson ("Lawson") shall move, before the Hon. Leonard B. Sand, United States District Judge, United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, on the 23rd day of February, 2012 at 2:15 pm in Courtroom 15-A, or as soon thereafter as the matter can be heard, for entry of an order: granting leave to amend the Class Action Complaint filed in this action on August 30, 2011, pursuant to Federal Rule of Civil Procedure 15(a).

The order sought here is proper because, as detailed in the accompanying Memorandum of Law, Plaintiff seeks leave to add information that has been brought to light by the Department of Justice since this case's filing in August, 2011 and to address deficiencies identified by this Court in its January 30, 2012 rulings in *Segal v. Bitar*, 11-civ-4521 (S.D.N.Y. June 30, 2011).

Dated: February 13, 2012

Respectfully submitted,

**WOLF POPPER LLP**

/s/ Lester L. Levy  
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